

### REMARKS

By this amendment, Claims 1, 4-6, 9-11, 14-16, 19, 20 have been amended. No claims are added or canceled. Hence, Claims 1-25 are pending in the application. Neither the amendments to the claims, nor the newly added claims, add any new matter to this application.

Each issue raised in the Office Action mailed April 19, 2007, is addressed hereinafter.

#### I. ISSUES RELATING TO CITED PRIOR ART

##### A. Claims 1-20—Shafer

Claims 1-20 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 7,072,946, issued to Shafer (“Shafer”). The rejections are respectfully traversed.

##### Independent Claims 1, 4, and 5

Independent Claim 1 recites:

storing updated management data at the router without  
implementing the updated management data,  
wherein the one or more data requests comprise a request for a  
confirmation that **updated management data have been  
implemented by the router** in response to a **request to  
commit changes** to the management data on the router.

(Emphases added.) In one embodiment, approach provides for updating management data on the router in two separate steps. First, the management data is stored at the router for subsequent implementation by the router. Next, a request is received for a confirmation that the updated management data was implemented by the router. One embodiment could use a lock management service, or another such service for maintaining data-integrity, to ensure that in multi-client applications, only one client at a time can control implementing updated management data.

*Shafer* does not describe the above-quoted features of Claim 1. *Shafer* states that the management server module emits a confirmation that a configuration change has been made, but

it does not disclose that the updated management data was updated and stored at the router without being implemented, as featured in Claim 1.

As one or more express elements of Claim 1 are not disclosed, taught, or suggested by *Shafer*, it is respectfully submitted that Claim 1 is patentable over the cited art and is in condition for allowance.

Independent Claim 4 recites:

a first operation includes **receiving updated management data** from the client, and wherein a second operation includes **implementing the updated management data on the router** in response to a **request to commit changes** to the management data on the router

In one embodiment, the approach provides for implementing the updated management data on the router only in response to a request to commit changes. In contrast, *Shafer* describes a request for information about a current candidate configuration, or a request to change router configuration. (Col. 10, lines 28–36.) It does not disclose any **request received from the client to commit changes** before implementing the updated management data on the router, as featured in Claim 4.

As one or more express elements of Claim 1 are not disclosed, taught, or suggested by *Shafer*, it is respectfully submitted that Claim 1 is patentable over the cited art and is in condition for allowance.

Independent Claim 5 includes some form of the limitations discussed above with respect to Independent Claim 1 and Claim 4. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of Claim 5 is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the independent claims. It is therefore respectfully submitted that Claim 5 is patentable over *Shafer* for at least the reasons given above with respect to Claims 1 and 4.

Claims 2, 3, 7, 8, 12, 13, 17, 18

Claims 2 and 3 are dependent claims, each of which depends (directly or indirectly) on Claim 1. Each of Claims 2 and 3 is therefore allowable for at least the reasons given above with respect to Claim 1. In addition, each of Claims 2 and 3 introduces one or more additional features that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of Claims 2 and 3 is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

Claims 7, 8, 12, 13, 17, and 18 include features similar to the claims discussed above, except in the context of computer-readable media, in means-plus-function form, or as an apparatus claim. It is therefore respectfully submitted that Claims 7, 8, 12, 13, 17, and 18 are patentable over *Shafer* for at least the reasons given above.

CONCLUSION

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any

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overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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